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November 13, 2024

By ECF

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

***Re: United States v. Sue Mi Terry, 24 Cr. 427 (LGS)***

Dear Judge Schofield:

We represent Dr. Sue Mi Terry in the above-captioned proceeding. We write pursuant to the Court's October 28, 2024 Order, [Dkt. No. 22](#), that the parties jointly propose a briefing schedule for pretrial motions. Accordingly, the parties propose the following schedule:

- Government's deadline to produce classified discovery: November 15, 2024
- Defendant's motion for a bill of particulars: December 4, 2024
  - Government's opposition: December 26, 2024
  - Defendant's reply: January 3, 2024
- Defendant's motion to dismiss the Indictment: February 5, 2025
  - Government's opposition: February 26, 2025
  - Defendant's reply: March 5, 2025
- Defendant's motion(s) to suppress and any other Rule 12(b)(3) motion(s): March 12, 2025
  - Government's opposition: April 2, 2025
  - Defendant's reply: April 9, 2025
- Government's CIPA Section 4 submission: April 15, 2025


Additionally, the parties each respectfully request an ex-parte CIPA Section 2 conference at the Court's convenience.

Respectfully submitted,

Faith E. Gay  
Temidayo Aganga-Williams  
Joshua W. Bean  
SELENDY GAY PLLC

All defense motions shall be filed together with a single memorandum of law. The memoranda of law by Defendant and the Government each shall be limited to 30 pages. Defendant's reply brief shall be limited to 15 pages. The total briefing schedule shall not exceed 60 days from the filing of the motions to the filing of the reply brief. By **November 20, 2024**, the parties shall propose a briefing schedule for the same as well as a date for the Government's CIPA submission.

Dated: November 15, 2024  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE